May 14, 2019

Ms. Paula Wilson
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

Dear Ms. Wilson:

The Idaho Department of Environmental Quality (Department) has initiated a negotiated rulemaking to address a future funding shortfall to the air quality Title V (Tier I Air Operating Permits) fund due to the Idaho National Laboratory no longer being a Title V source. The Idaho Association of Commerce & Industry (IACI) is the leading trade association of Idaho businesses representing hundreds of members of all sizes engaged in diverse commercial and industrial enterprises throughout the state.

IACI has been an active participant in earlier rulemakings on the setting of Title V fees and has the following comments on the draft rule.

- IACI supports a three component approach to funding the Title V program where fees are based on a registration fee, emissions, and fee for service. The revenue from each of these three components should be approximately one-third of the total cost of the program.

- The work by the Department to control Title V program expenses is appreciated. IACI encourages the Department to continue carefully reviewing expenses associated with the Title V program and look for ways to further reduce such costs.

- For the "fee for service" portion of the Title V funding program, it would be very useful for DEQ to provide information back to the permittees on the number of hours spent on: inspections, source test review, permit processing, etc.

Specific comments on rule language changes are as follows:

- Agree with the deletion of the radionuclide registration in 389.05.

- The replacement of text in 390 with tables as this change makes this section much more readable.

- Agree with the deletion of the 390.03 Radionuclide registration fee.

- Recommend keeping 397, but lowering the minimum amount in 397.02 to $200,000.

IACI appreciates the opportunity to provide comments on this rulemaking.

Sincerely,

Alex LaBeau
President

cc: Alan Prouty, Chair
     IACI Environment Committee